

FILED

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE

2025 MAR 28 AM 10:14

US DISTRICT COURT
EASTERN DIST. TENN.

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
v.) Case No.: 3:22-CR-118-TAV
)
EDWARD KELLEY,)
)
)
Defendant.)
)

MOTION FOR RELIEF

William Taylor hereby submits this Motion for Relief in the above styled and numbered case to protect and enforce his federal rights as an identified federal crime victim pursuant to 18 U.S.C. § 3771. *See* 18 U.S.C. § 3771(a) (listing such rights); 18 § U.S.C. 3771(d)(1) (authorizing the assertion of such rights); and 18 U.S.C. § 3771(d)(3) (providing that such rights be asserted in the district court in which defendant is being prosecuted or where the crime occurred).

On or about August 12, 2024, William Taylor delivered an unredacted letter (“Letter A”) to this Court concerning the criminal investigation of Defendant Edward Kelley in this case. On or about February 7, 2025, William Taylor delivered a second unredacted letter (“Letter B”), this time addressed to U.S. Attorney Francis Hamilton at the U.S. Attorney’s Office in Knoxville, TN. William Taylor seeks the following relief relating to Letter A and Letter B:

1. To receive, or to inspect and copy, all prior and future orders of the Court regarding the sealing of and/or redactions to Letter A or Letter B, and any transcripts of court proceedings relating in any way to Letter A or Letter B, and any filings by the

Parties concerning Letter A or Letter B. The purposes of this request are to ensure Taylor has sufficient information to reasonably protect his rights to fairness and to respect for his dignity and privacy, to reasonably protect his right to personal safety, and to hold individuals accountable who violated his rights.

2. To Issue a Protective Order prohibiting the parties in the case, including counsel for each of the parties, from further disclosing William Taylor's home address and home telephone number, and, to the extent possible, prohibiting Jake Lang and Brittany Bailey from publicly publicizing, posting, or otherwise sharing William Taylor's home address and home telephone number. To the extent Lang or Bailey have already publicized, posted, or otherwise publicly shared Taylor's home address and home phone number, Taylor also requests this Court require them to take down such blog posts, photos, or other writings containing such information.

3. To Order the Parties in the case, including counsel for each of the parties, to abide by the Court's Sealing Orders in this case, including but not necessarily limited to Letter A and Letter B, and to refrain from violating the CVRA rights of William Taylor going forward.

4. To Remedy Prior Violations of the CVRA by the Federal Bureau of Investigation, the U.S. Attorney's Office for the Eastern District of Tennessee, the Defendant, and Defendant's counsel, specifically violations of 18 USC 3771(a)(1) and (a)(8), to the extent possible and consistent with law and justice, and William Taylor's rights as a crime victim to fairness, to respect for his dignity and privacy, and to his personal safety. This includes, but is not limited to, requiring the Parties in this case

and their counsel to provide a list to William Taylor of all parties to whom any of them have disclosed unredacted copies of Letter A or Letter B.

5. To Order the relevant Parties and their counsel, and Jake Lang and Brittany Bailey to the extent possible, to abide by the Court's Sealing Orders and Protective Order, even if and after the Defendant is released from prison.

6. To schedule a hearing on this Motion for Relief if necessary for any of the relief requested to be granted.

7. To order any other relief the Court deems just and warranted, including but not limited to sanctions, if warranted, and reasonable attorney fees, for CVRA violations against William Taylor and Sealing Order violations against the Court and William Taylor.

In support of this Motion for Relief, William Taylor is simultaneously filing a Brief in Support of this Motion to Dismiss setting forth the facts and legal authorities entitling him to the requested relief.

Respectfully submitted,

Date: March 28, 2025

/s/ Matt M. Dummermuth
Matt M. Dummermuth
(*Pro Hac Vice* admission pending)
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Counsel for William Taylor

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2025, a true and correct copy of the foregoing was served by first class mail and electronic mail on:

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/s/ Matt M. Dummermuth
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